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July 26, 2022

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of May 31, 2022, ECF No. 8063, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's November 24, 2020 order, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

On July 22, 2022, Saudi Arabia circulated revised proposals for FBI redactions to Saudi Arabia's filings associated with the Court's July 22, 2019 orders and the Khalil and Kaldirim deposition transcripts, which Saudi Arabia attached as sealed exhibits to June 18 and June 27, 2019 letters. These revisions propose removing redactions of materials that were publicly released pursuant to section 2 of Executive Order 14040.

Plaintiffs are continuing to review the redactions proposed by Saudi Arabia.

The FBI is currently reviewing the Plaintiffs' proposed redactions to their expert reports. Upon completion of that review, the FBI will review the redactions recently proposed by Saudi Arabia. The FBI understands that the parties will continue to provide the FBI with proposed redacted versions of filings that reflect the redactions set forth in documents publicly released pursuant to section 2 of Executive Order 14040.

One June 7, 2022, Dallah Avco informed the parties that it takes no position on Saudi Arabia's proposed redactions for filings related to the Court's January 14, 2022 and June 18, 2021 orders. On July 23, 2022, Dallah Avco informed the parties that it takes no position on proposed FBI redactions in materials associated with the Court's July 22, 2019 orders and the Khalil and Kaldirim deposition transcripts.

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Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before September 27, 2022.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)